

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

NILOUFAR BAHADORIFAR,

Defendant.

No. 21-cr-430 (RA)

ORDER

RONNIE ABRAMS, United States District Judge:

Before the Court is Petitioner Niloufar Bahadorifar’s motion for post-conviction relief under 28 U.S.C. § 2255 on grounds of ineffective assistance of counsel. Dkt. 82. On September 11, 2024, the Court directed Ms. Bahadorifar to file a waiver of attorney-client privilege so that her former counsel, Jeffrey Lichtman and Jeffrey Einhorn (“Counsel”), could file an affidavit or declaration addressing the allegations of ineffective assistance. Dkt. 113. The Court ordered Counsel to file those materials no later than thirty days after Ms. Bahadorifar filed the waiver. *See id.* at 2.

Ms. Bahadorifar filed the waiver on January 15, 2024. To date, Counsel have not yet filed their affidavit or declaration. They shall do so no later than March 14, 2025.

The Clerk of Court is respectfully directed to mail a copy of this order to Ms. Bahadorifar.  
SO ORDERED.

Dated: February 21, 2025  
New York, New York

  
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Ronnie Abrams  
United States District Judge